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April 13, 2019 Judge Sterling Johnson, Jr. United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

> Re: *Hammock v. Moving State to State, LLC et al.*, No. 1:18-cv-05628-SJ-ST: Status Update and Request for

> > Expedited Consideration of Motion for Pre-26(a) Conference

Discovery

I write on behalf of the Plaintiff, Cory Hammock, in the matter, to respectfully request an expedited ruling on his Motion for Pre-26(a) Conference Discovery, filed on

Mr. Hammock, who has had almost all of his personal belongings held hostage by Defendants and withheld from him since early September of 2018, has 1) been told by Defendants that these belongings are in storage in particular unit numbers at a particular facility in Queens, New York; 2) has obtained the voluntary cooperation of that storage facility in locking down these units until he can obtain a court order authorizing him to access and inventory the contents to confirm they are his; and 3) has been battling Defendants who have not participated in this litigation despite actual notice and proper service, who are in default, and whom your Honor has held in Contempt for failing to appear at conferences as ordered.

Mr. Hammock respectfully requests that this court grant the abovementioned motion so that he may issue a non-party subpoena to the storage company in order to inventory the units where Defendants claim to be keeping his personal belongings. Once such inventory process confirms whether the items in the lockers are his and if so which items, Mr. Hammock may then move for a specific order of possession of all or part of the contents of those units. Dated: April 13, 2019

Respectfully Submitted,

/s/ T. Bryce Jones

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